Clerk, U.S. District Court
Southern District of Texas
FILED

MAY 27 2016

David J. Bradley, Clerk of Court

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA
V.
Jacqueline Jean BIBLES **Katherine Lynn HARMON**
Deitra Ellen PIERCE

CRIMINAL COMPLAINT

Case Number: C-16-659M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about **5/25/2016** (Date) in **Brooks** County, in the Southern District of Texas defendants **Jaqueline Jean BIBLES, Katherine Lynn HARMON, & Deitra Ellen PIERCE**
each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law
in violation of Title **8** United States Code, Section(s) **1324**.
I further state that I am a(n) **Special Agent** (Official Title) and that this complaint is based on the following facts:

See Attached Affidavit of ICE Special Agent **Eric Martinez**

Continued on the attached sheet and made a part of this complaint: [X] Yes [ ] No

Signature of Complainant

Eric Martinez
Printed Name of Complainant

Sworn to before me and signed in my presence,

May 27, 2016 at **Corpus Christi, Texas**
Date City and State

Jason Libby, U.S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

On May 25, 2016, U.S. Border Patrol (USBP) Agent Jose Ahumada was working primary immigration inspection duties at the U.S. Border Patrol Checkpoint located on Highway 281 near Falfurrias, Texas. At approximately 1640 hours, a black in color Saturn Ion bearing Texas license plate number GVV8896 entered the primary inspection lane. USBP Agent Ahumada observed three occupants: the driver, later identified as Katherine Lynn HARMON, the front passenger, later identified as Ana Irma QUINTANILA-Rivas, and the rear passenger, later identified as Jacqueline Jean BIBLES. Agent Ahumada asked all the occupants their citizenship. HARMON replied "We are all U.S. citizens". Agent Ahumada asked QUINTANILLA if she was a U.S. citizen, however QUINTANILLA did not respond and avoided eye contact. Agent Ahumada then asked QUINTANILLA her age, however, QUINTANILLA just stared and then replied "yes". Agent Ahumada referred the vehicle to the secondary inspection lane. USBP Agent Richard McCasland relieved Agent Ahumada and took over primary inspection duties.

At the secondary inspection lane, QUINTANILLA admitted to USBP Agent Davis she was a citizen of El Salvador and was unlawfully present in the U.S. BIBLES, HARMON, and QUINTANILLA were escorted into the checkpoint.

On May 25, 2016, at approximately 1650 hours, a gold Lincoln Continental bearing TX license plates of CNZ3556, driven by an individual, later identified as Deitra Ellen PIERCE, entered the primary inspection lane. Agent McCasland observed the rear windows were rolled down but not the front window. PIERCE opened the front door and stated the window did not work. PIERCE stated she was going to Houston, TX. Agent McCasland immediately observed PIERCE was shaking and appeared to be nervous. PIERCE stated she had been in the Rio Grande Valley for several days. Agent McCasland observed no luggage only a small bag. Agent McCasland asked PIERCE for consent to search the trunk of the vehicle. PIERCE replied "yes, that's fine". Agent McCasland walked to the back of the vehicle; however PIERCE failed to open the trunk with the push button. Agent McCasland observed PIERCE was not pushing the button all the way down. Agent McCasland instructed PIERCE to park in the secondary inspection lane.

At the secondary inspection lane, USBP Agents opened the trunk of the vehicle and discovered a female individual, later identified as Rocio RODRIGUEZ-Caicersos in the trunk. Agents observed RODRIGUEZ was sweating profusely and her face was very red. USBP Agents escorted PIERCE into the USBP checkpoint. USBP Agents asked RODRIGUEZ if she needed medical attention, however RODRIGUEZ declined but asked for water. USBP Agents provided RODRIGUEZ water. Subsequently, RODRIGUEZ admitted she was a citizen of El Salvador and was unlawfully present in the U.S.

Inside the USBP checkpoint, USBP Supervisor Agent Stacey Leal was overlooking the two cases and assigning tasks. Supervisor Leal observed QUINTANILLA and ROCIO knew each other. Supervisor LEAL conducted a search incident to arrest of PIERCE' purse and discovered a rental receipt for a dwelling in the amount of $900 which had the names of Jacqueline Jean BIBLES and Deitra Ellen PIERCE written on it. Supervisor LEAL realized BIBLES and PIERCE were roommates and were part of the same conspiracy.

Inside the USBP checkpoint, Agent Ahumada read HARMON, BIBLES, and QUINTANILLA their Miranda Rights in their preferred language. PIERCE was read her Miranda Rights in English by Agent McCasland. All stated they understood their rights and agreed to provide a statement without the presence of an attorney.

STATEMENT BY PRINCIPAL, HARMON:

HARMON admitted she knew she was smuggling aliens. HARMON stated Deitra PIERCE was in a relationship with HARMON's brother. HARMON spoke with a friend, henceforth referred to as "FRIEND1", and agreed to smuggle aliens for FRIEND1. HARMON stated she solicited the help of BIBLES and PIERCE for the smuggling venture. BIBLES and PIERCE agreed to help HARMON transport the aliens back north from the Rio Grande Valley. HARMON stated FRIEND1 met HARMON, BIBLES, and PIERCE in West, TX. They followed FRIEND1 in the Saturn Ion to the Rio Grande Valley. FRIEND1 instructed HARMON to rent a room at a Motel located in Donna, TX, and to await further instructions. On May 25, 2016, FRIEND1 arrived at the Motel room and HARMON, PIERCE, and BIBLES followed FRIEND1 to a home. HARMON stated she had some overheating problem with the Saturn and they waited while it was repaired at the home. HARMON observed another female referred by FRIEND1 as "BOSS LADY". BOSSLADY wanted to put the female alien inside the trunk of the Saturn ION, however HARMON refused and they came to the agreement to smuggle the female alien as a passenger. HARMON stated she observed PIERCE was provided a vehicle (Lincoln Continental) and HARMON observed a person was placed in the trunk of the vehicle.

STATEMENT BY PRINCIPAL, BIBLES:

BIBLES stated Deitra Ellen PIERCE was her roommate. BIBLES stated HARMON, BIBLES, and PIERCE had all departed Weatherford, TX, and had traveled together to the Rio Grande Valley. Prior to arriving in the Rio Grande Valley they met HARMON's friend, FRIEND1. BIBLES stated they were going to get paid $800 per smuggled alien by FRIEND1. BIBLES stated they all arrived in the Rio Grande Valley on May 24th at approximately 11:30 p.m. BIBLES, HARMON, and PIERCE followed FRIEND1 to a home where FRIEND1 made contact with someone. Then, BIBLES PIERCE, and HARMON checked into the Super 8 Hotel in the

Rio Grande Valley and spent the night. The next morning, BIBLES, PIERCE, and HARMON arrived at the home. BIBLES stated they spent two hours there with FRIEND1, FRIENDS1 boyfriend, and an unknown Woman. BIBLES accompanied HARMON and departed with the female alien in the Saturn Ion. BIBLES stated PIERCE traveled alone in the other vehicle. BIBLES stated BIBLES, PIERCE, and HARMON all knew they were smuggling aliens. BIBLES stated the initial plan was to smuggle the two aliens past the USBP checkpoint in Falfurrias, TX, and to await further instructions from FRIEND1.

STATEMENT BY PRINCIPAL, PIERCE:

PIERCE initially agreed to provide a statement when read her Miranda Rights, however prior to the interview PIERCE invoked her right to counsel.

STATEMENT BY MATERIAL WITNESS, QUINTANILLA:

QUINTANILLA stated she was a citizen of El Salvador and entered the U.S. on May 22, 2016, on a raft with 6 other aliens near Hidalgo, TX. QUINTANILLA stated she was going to pay approximately $8000 in smuggling fees to be smuggled to Houston, TX. QUINTANILLA and the other smuggled aliens walked for several hours and then were picked up in a vehicle and transported to a house. QUINTANILLA stated one of the females who crossed the Rio Grande River with her was ROCIO (Rocio RODRIGUEZ-Caiceros). QUINTANILLA and ROCIO remained at the house until May 24th, 2016. QUINTANILLA and ROCIO were transported together in a vehicle to a 2nd house. QUINTANILLA observed approximately 8 other aliens were at the home. QUINTANILLA stated she was escorted by a person to a car parked outside the home. QUINTANILLA stated she sat in the front passenger seat of the vehicle. QUINTANILLA stated on the way to the checkpoint the driver rehearsed with her several questions: "Where I am from; where I was going; and if I was an American". QUINTANILLA viewed a photo lineup and identified the driver. Record checks conducted by USBP revealed the driver identified was Katherine Lynn HARMON. QUINTANILLA stated the driver and the other passenger spoke to each other but QUINTANILLA could not understand English.

STATEMENT BY MATERIAL WITNESS, RODRIGUEZ:

RODRIGUEZ stated she was a citizen of Mexico. RODRIGUEZ entered the U.S. on May 22, 2016, by crossing the Rio Grande River near Hidalgo, TX. RODRIGUEZ stated she walked for several hours and then was transported in a pickup truck to a home. On May 25, 2016, RODRIGUEZ was transported to a 2nd house. At the 2nd house, RODRIGUEZ was escorted outside and observed several women standing around a gold sedan. RODRIGUEZ was shown photo lineups of the 3 principals in this case but could not identify anyone. RODRIGUEZ simply stated she did not get a good look at the women standing around prior to entering the trunk of the vehicle. RODRIGUEZ stated she believed she was in the trunk of the vehicle for approximately 1 or 2 hours. RODRIGUEZ stated it was very hot and she was having difficulty breathing. RODRIGUEZ stated she attempted to tear the carpet in the trunk in order to obtain air. RODRIGUEZ was unsure what was going to happen to her and she feared for her life because of the lack of oxygen.

Record checks conducted by USBP revealed the Saturn Ion was registered to Katherine Lynn HARMON at [redacted] in Whitney, TX. The Lincoln Continental was registered to Abraham RIOS at [redacted] in Mission, TX.

USBP ascertained PIERCE, BIBLES, and HARMON were all U.S. citizens.

PIERCE informed USBP she has a pace maker and takes medication; and BIBLES informed USBP she takes medication for anxiety.

AUSA John Muschenhiem was notified and accepted prosecution of PIERCE, HARMON, and BIBLES for violation of Title 8 USC 1324.

Eric Martinez

Special Agent

Homeland Security Investigations

SUBSCRIBED AND SWORN

BEFORE ME THIS 27th DAY

ON MAY OF 2016.

Jason Libby, U.S. Magistrate Judge